

REMARKS

Claims 3-7, 9-20 and 22-23 are pending. By this Amendment, Claim 21 is cancelled without prejudice or disclaimer; Claims 6, 15-17 and 22 are amended; and Claim 23 is added. Applicants respectfully submit that no new matter is submitted herein.

Entry of Response Proper

Entry of this Amendment is proper under 37 C.F.R. §1.116 since the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issues requiring further search and/or consideration on the part of the Examiner as the Amendment merely clarifies the claimed features of the invention; (c) satisfy a requirement of form asserted in the previous Office Action; (d) do not present any additional claims without canceling a corresponding number of finally rejected claims as previously considered Claim 21 is cancelled without prejudice or disclaimer and Claim 23 is added; and (e) place the application in better form for appeal, should an appeal be necessary. The Amendment is necessary and was not earlier presented because it is made in response to objections raised in the Final Rejection. Entry of the Amendment is thus respectfully requested.

Title:

The Title of the application was objected to for not being descriptive of the claimed invention. In this regard, the Applicants have amended the Title herein in a manner believed to be responsive to the objection. As such, Applicants respectfully request withdrawal of the objection.

Allowable Subject Matter

Applicants respectfully acknowledge and appreciate the indication by the Examiner that Claims 15 and 17, although objected to as being dependent upon a rejected claim, would be allowable if rewritten in independent form, including all of the features of the base claim and any intervening claims. In this regard, Applicants respectfully submit that Claims 15 and 17 have been amended to incorporate the subject matter recited in rejected base Claim 22 and any intervening claims therein, thereby placing Claims 15 and 17 in condition for allowance. As such, Applicants respectfully request withdrawal of the objection to Claims 15 and 17.

Claims 3-7, 9-14, 16 and 18-23 Also Recite Allowable Subject Matter

Claims 3-7, 16, 18-20 and 22 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Number 6,255,778 to Yoshikawa et al. (Yoshikawa). Claims 3-7, 9-11, 20 and 22 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Publication US 2003/0085649 A1 to Wachi et al. (Wachi). Claims 12-14 are rejected under 35 U.S.C. §103(a) as being unpatentable over Yoshikawa taken in view of U.S. Patent Number 6,417,619 to Yasunori et al. (Yasunori). Claim 21 is rejected under 35 U.S.C. §103(a) as being unpatentable over Yoshikawa.

Applicants respectfully traverse all of the rejections for the following reason(s).

Claim 22 recites a flat display apparatus having a flat display panel, including an optical filter attached to a display screen surface of the flat display panel, wherein the optical filter is formed by laminating ***and adjoining mutually***, in order, an electromagnetic-wave blocking layer, an infrared-radiation absorbing and color-tone

correcting layer, an ambient light antireflective layer, wherein the optical filter is attached to the display screen surface of the flat display panel by a transparent adhesive material, and wherein the electromagnetic-wave blocking layer is configured in a position to relax any influence heat and light from the flat display panel may have on the infrared-radiation absorbing and color-tone correcting layer.

Applicants note the Office Action states the arguments from the Response filed March 15, 2006 were not persuasive. The Office Action asserts that the applied art of record teaches the recited layers of Claim 22 and that the presence of any intermediary layers therebetween still permits the applied art of record to read on the recited order of the layers in Claim 22. In this regard, Applicants have amended Claim 22 to recite the layers are mutually adjoining, which is not taught or suggested by the applied art of record because of the presence of the intermediary layers in the applied art of record prevent the applied art of record from anticipating or rendering obvious the claimed invention for at least the reasons discussed in the March 15 Response. For this reason alone, Applicants respectfully submit that the arguments from the March 15 Response, which are incorporated herein in their entirety, should be sufficient to traverse the outstanding rejections.

However, in case the above reasserted argument is still considered not persuasive, then Applicants also submit the following in support of the patentability of the pending claims.

As noted above, Claim 22 recites that the optical filter is formed by laminating **and adjoining mutually**, in order, the electromagnetic-wave blocking layer, the infrared-

radiation absorbing and color-tone correcting layer and the ambient light antireflective layer. The optical filter is attached to the display screen surface of the flat display panel in a condition such that the electromagnetic-wave blocking layer is configured in a position which relaxes influence of heat and light from the flat display panel to the infrared-radiation absorbing and color-tone correcting layer.

Yoshikawa teaches an antireflection film 6, a conductive mesh member 3, and a heat-ray blocking film 5 that are not arranged in the order as in the claimed invention. Further, a transparent base plate is disposed between the antireflection film 6 and the conductive mesh member 3. As such, Applicants respectfully resubmit that Yoshikawa does not disclose, teach, suggest or otherwise indicate a lamination order of the optical filter let alone the structural configuration of the electromagnetic-wave blocking layer like the features recited in Claim 22.

Specifically, in addition to failing to include the feature regarding the laminating order, Applicants note that Yoshikawa fails to disclose or suggest an electromagnetic-wave blocking layer being positioned to relax any influence heat and light from the flat display panel may have on the infrared-radiation absorbing and color-tone correcting layer.

In Wachi, an antireflection layer 6, a near infrared ray shielding layer 9 and an electromagnetic-wave shielding layer 15 of a front protective plate 13 are arranged in order. However, the front protective plate 13 of Wachi has a transparent substrate 14 arranged between the electromagnetic-wave shielding layer 15 and an adhesive layer 7 as shown in Figure 2, or arranged between the near infrared ray shielding layer 9 and the

electromagnetic-wave shielding layer 15 as shown in Figure 3. Therefore, Applicants respectfully resubmit that the transparent substrate 14 being arranged between the electromagnetic wave shielding layer 15 and the flat display panel 2 (see Figure 2) prevent Wachi from being considered to disclose or suggest the order of layers recited by Claim 22 and that Wachi actually teaches a structural configuration that not only is different from the claimed invention but is much more complicated.

Applicants respectfully submit that Yasunori fails to cure or otherwise address the above-described deficiencies of Yoshikawa and Wachi.

To qualify as prior art under 35 U.S.C. §102, a single reference must teach, i.e., identically describe, each feature of a rejected claim. As explained above, Yoshikawa and Wachi each fail to disclose or suggest each and every feature recited by Claim 22. Therefore, Applicants respectfully submit Yoshikawa and Wachi do not anticipate or render obvious the invention recited by Claim 22. As such, Applicants respectfully submit Claim 22 should be deemed allowable over Yoshikawa and Wachi.

To establish *prima facie* obviousness, each and every feature recited by a rejected claim must be taught or at least suggested by the applied art of record. See M.P.E.P. §2143.03. As explained above, Yoshikawa, Wachi, and Yasunori, alone or in any combination thereof, fail to teach or suggest each and every feature recited by Claim 22. Therefore, Claim 22 is not rendered obvious in view of the teachings of the Yoshikawa, Wachi and Yasunori. Accordingly, Applicants respectfully submit Claim 22 is allowable over Yoshikawa, Wachi and Yasunori.

Claims 3-7, 9-14, 16 and 18-20 depend from Claim 22. It is respectfully submitted that these dependent claims be deemed allowable at least for the same reason(s) Claim 22 is allowable, as well as for the additional subject matter recited therein.

Withdrawal of all the rejections is respectfully requested.

Claim 23 Also Recites Allowable Subject Matter

Applicants respectfully submit that Claim 23 should also be deemed allowable for at least the following reasons.

Claim 23 recites, among other features, that the transparent adhesive material has an adhesive strength of 3 kgf/inch or less when being vertically detached.

The adhesive material used on the display of Yoshikawa is a thermoplastic adhesion resin with an adhesive force that is obtained by being cooled after dissolution by heat. The adhesive material used on the display of Wachi is a thermoplastic adhesion resin, an UV cure adhesive resin having an adhesive force that is obtained after being cured by UV, or a thermoset adhesion resin with an adhesive force that is obtained after being cured by heat. In view of the above, Applicants respectfully submit that while the adhesion resins of Yoshikawa and Wachi are suitable for lasting fixation (that is, they hold for a long time), they are not suitable for detachable fixation. In addition, Yoshikawa and Wachi indicate EVA whose index of refraction is about 1.5 as a transparent adhesive material and have an adhesive strength that is greater than 3 kgf/inch. As such, Applicants respectfully submit Claim 23 should be allowable over the applied art of record for at least the reason provided above.

Conclusion

In view of the foregoing, reconsideration of the application, withdrawal of the outstanding objections and rejections, allowance of Claims 3-7, 9-20 and 22-23, and the prompt issuance of a Notice of Allowability are respectfully solicited.

Should the Examiner believe anything further is desirable in order to place this application in better condition for allowance, the Examiner is requested to contact the undersigned at the telephone number listed below.

In the event that the filing of this paper is not deemed timely, Applicants petition for an appropriate extension of time. Any petition fee for the extension of time and any other fees that may be required in relation to this paper can be charged to Deposit Account No. 01-2300, **referencing Docket No. 107156.00216**.

Respectfully submitted,



Murat Ozgu
Attorney for Applicants
Registration No. 44,275

Enclosures: Petition for Extension of Time (2 months)
Extra Claims Fee Transmittal

Customer No. 004372

AREN'T FOX PLLC
1050 Connecticut Avenue, N.W., Suite 400
Washington, D.C. 20036-5339
Tel: (202) 857-6000
Fax: (202) 638-4810

MO:elp